

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

LEON BLACK,

Defendant.

Case No. 1:23-cv-06418-JGLC

DECLARATION OF CARLOS MELENDEZ

I, CARLOS MELENDEZ, hereby declare under penalty of perjury that the following is true and correct:

1. I am fully familiar with all matters set forth in this Declaration based on personal knowledge about the facts and matters below. I am over the age of 18 years and not laboring under any disabilities.

2. My name is Carlos Melendez. My date of birth is October 7, 1939. I am 84 years old.

3. I am a retired U.S. Army Infantry Officer with 20 years of military service. I enlisted in the U.S. Army in 1961, and was honorably discharged in 1981.

4. During my military service, I received the following awards and decorations, among others: (i) Distinguished Flying Cross; (ii) Air Medal with 28 Oak Leaf Clusters; (iii) Bronze Star with 3 Oak Leaf Clusters; (iv) Army Commendation Medal with 3 Oak Leaf Clusters; (v) Joint Commendation Medal; (vi) Good Conduct Medal; (vii) Combat Infantry Badge; (viii) Expert Infantry Badge; (ix) Parachute Badge, Ranger Tab; (x) Army Aviator Badge; (xi) Senior Army Aviator Badge; (xii) National Defense Service Medal; and (xiii) Vietnamese Service Medal.

5. I have several investigatory designations, including: (i) Certified Fraud Examiner; (ii) Certified International Investigator, CII; (iii) Private Investigator, Class C License #0001855, Florida; and (iv) Private Investigative Agency, Class A License #A0002225.

6. I have substantial experience with investigations and private security. I have served as an Independent Contractor Investigator for investigative agencies, corporate, insurance, and law firm clients. I have served as a security director for The Green Companies in Miami, Florida, and a security consultant for the Miami International Boat Show and several property managers in Miami, Florida.

7. I was engaged to investigate the claims and allegations made by Jane Doe in the above-captioned litigation.

8. In connection with that investigation, I conducted interviews with several individuals with close affiliations with Ms. Doe. In each instance that someone agreed to speak with me, I recorded the conversation, including confirming on the recording that the individual knew he or she was being recorded, consented to it, and was speaking with me voluntarily and with no coercion or inducement.

9. Of particular relevance here, on November 15, 2023, and December 19, 2023, I conducted interviews with an individual who met Ms. Doe through social media and interacted with Ms. Doe both on social media and offline. This individual wishes to remain anonymous, and is hereinafter referred to as "Twitter User 1."

10. The recordings of my interviews with Twitter User 1 demonstrate that they told me, in sum or substance, the following information:

- Beginning sometime in the fall of 2022, Twitter User 1 began attending events on Twitter, known as Twitter "Spaces." Spaces are hosted, live audio conversations that are conducted using the Twitter app.

- Most of the Spaces events that Twitter User 1 attended at that time were hosted by a single individual ("Host 1"). The topic of these Spaces events exclusively involved politics.
- When Twitter User 1 first started attending Host 1's Spaces events, they took place five times per week, Monday through Friday. At some later point in time, the frequency of the events decreased to four times per week, Monday through Thursday. Twitter User 1 attended most of Host 1's Spaces events that were held from the fall of 2022 through April 2023.
- Throughout that time period, one of the speakers at Host 1's Spaces events was a person who referred to herself as "[REDACTED]" or "[REDACTED]". Her Twitter username at the time was "[REDACTED]". "[REDACTED]" frequently spoke during Host 1's Spaces events. Twitter User 1 estimates that between the fall of 2022 and April 2023, "[REDACTED]" spoke dozens of times during these particular events.
- Each and every time that "[REDACTED]" spoke at these events, she introduced herself as a "survivor" or a "victim" of Jeffrey Epstein. Twitter User 1 cannot recall a single occasion where "[REDACTED]" did not refer to herself as connected to Epstein when she spoke during Host 1's Spaces events.
- Twitter User 1 found the fact that "[REDACTED]" always introduced herself and identified herself as an Epstein victim and/or survivor at these Spaces events to be strange for two reasons. First, Twitter User 1 did not think it was healthy or normal for "[REDACTED]" to constantly identify herself as a victim of this kind of trauma. Second, the topics of all Host 1's Spaces events were politics. Other than "[REDACTED]" comments, the events and the discussion that took place during the events had nothing to do with Epstein, sex trafficking, or sexual assault.
- During these Spaces events, "[REDACTED]" spoke in a high-pitched voice and otherwise acted in a manner and with affectations that Twitter User 1 perceived to be childlike. For the entire time that Twitter User 1 interacted with "[REDACTED]" they believed that "[REDACTED]" was a child and not an adult.
- Twitter User 1 also interacted with "[REDACTED]" through the exchange of more than 100 direct messages on Twitter, primarily on two occasions: January 31-February 1, 2023; and on March 8, 2023. "[REDACTED]" tone and the content of her messages during these interactions also led Twitter User 1 to believe that she was a child, not an adult.
- Twitter User 1 also followed "[REDACTED]" Twitter account during that time. As a result, Twitter User 1 saw that "[REDACTED]" had posted multiple statements on her Twitter account in which she publicly stated that she was a victim and/or survivor of Epstein. As just one example, Twitter User 1 saved a copy of a post that "[REDACTED]" made on "[REDACTED]" in which she stated publicly that she was "[REDACTED]". A true and correct copy of the screenshot that Twitter User 1 saved of that post, and shared with me, is attached to this Declaration as Exhibit A.

- During this time period (fall 2022 to April 2023), Twitter User 1 also attended a few Twitter Spaces events that were hosted by a different individual (“Host 2”). Host 2’s Spaces events that Twitter User 1 attended were primarily about fashion, but at least one was about the Israeli-Palestinian conflict. Twitter User 1 cannot recall the exact number of Host 2’s Spaces events that they attended, but recalls attending least five such events but no more than ten.
- “[REDACTED]” also attended all of Host 2’s Spaces events that Twitter User 1 attended. She spoke at some of these events. The tone of “[REDACTED]” voice and her mannerisms during Host 2’s Spaces events was markedly different than the tone of voice and the mannerisms that “[REDACTED]” used when she spoke at Host 1’s Spaces events. She presented herself as less childlike during Host 2’s Spaces events.
- Twitter User 1 indicated that the difference between the way that “[REDACTED]” spoke and presented herself at these different Spaces events was striking. If Twitter User 1 had not known that it was [REDACTED] speaking at all of these events, they would have thought that entirely different people were speaking as “[REDACTED]” at Host 1’s and Host 2’s Spaces events.
- After Twitter User 1 exchanged direct messages with “[REDACTED]” via Twitter on April 8, 2023, they had no further contact with her.

11. On September 29, 2023, and October 20, 2023, I conducted interviews with another individual who met Ms. Doe through social media and interacted with Ms. Doe both on social media and offline. This individual wishes to remain anonymous, and is hereinafter referred to as “Twitter User 2.”

12. The recordings of my interviews with Twitter User 2 demonstrate that they told me, in sum or substance, that Plaintiff relayed to both Twitter User 2 and another individual specific allegations about Mr. Black, using his name, that were substantially similar, if not identical to those in the Complaint in this action.

13. I have read this Declaration more than once very carefully. Every statement in this Declaration is completely truthful and accurate and I have given this Declaration under my own free will. I have not been threatened in any way or offered any money to make this Declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in TAMARAC, FLORIDA on OCT 3, 2024.

By: Carlos Melendez
Carlos Melendez